



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MTK
F. #2016R00614

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 7, 2020

By Hand and ECF

The Honorable Kiyo A. Matsumoto
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Christopher Curanovic
Criminal Docket No. 17-404 (S-1)(KAM)

Dear Judge Matsumoto:

The government respectfully submits this supplemental sentencing letter in advance of the defendant Christopher Curanovic's sentencing in the above-captioned case, which is scheduled for January 9, 2019 at 11:00 a.m. The government sets forth its revised Guidelines calculation:

Revised Guidelines Calculation:

The government's revised Guidelines calculation is as follows:

Count Three (Money Laundering Conspiracy)

Base Offense Level (§ 2S1.1(a)(2))	8
Plus: Value of the Funds (§ 2B1.1(b)(1)(E))	+8
Plus: Conviction under 18 U.S.C. § 1956 (§ 2S1.1(b)(2)(B))	+2
Plus: Defendant Knew Laundered Funds Were Proceeds of Sale of Controlled Substance (§ 2S1.1(b)(1))	<u>+6</u>
Total:	<u>24</u>

The Probation Department calculated that the defendant's criminal history score is 5, and that his criminal history category therefore is III. PSR ¶ 75. After three levels are subtracted from the total offense level of 24 to reflect the defendant's acceptance of responsibility, the resulting offense level is 21. This results in an applicable Guidelines range of 46 to 57 months' imprisonment.

However, for the reasons set forth in its previous submission, the government respectfully requests that the Court impose a sentence between 57 and 71 months' imprisonment, which is sufficient, but not greater than necessary, to achieve the goals of sentencing. See U.S.S.G. § 3553(a)(2).

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
Michael T. Keilty
Assistant U.S. Attorney
(718) 254-7528

cc: Elizabeth Macedonio, Esq. (by ECF)
Clerk of Court (KAM) (by ECF)